

Tommy J. Swann, State Bar No. 19552820  
 tswann@mhbgb.com  
 Michael S. Uryasz, State Bar No. 24082440  
 muryasz@mhbgb.com  
 McCLESKEY, HARRIGER, BRAZILL & GRAF, L.L.P.  
 5010 University Ave, 5th Floor  
 Lubbock, Texas 79413-4422  
 (806) 796-7300, (806) 796-7365 FAX

ATTORNEYS FOR SECURED CREDITOR MANHEIM

**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 LUBBOCK DIVISION**

<b>IN RE:</b>	§	
<b>REAGOR-DYKES MOTORS, LP</b>	§	<b>Case No. 18-50214-rlj11</b>
<b>Debtor.</b>	§	
<hr/>	§	
<b>IN RE:</b>	§	
<b>REAGOR-DYKES IMPORTS, LP</b>	§	<b>Case No. 18-50215-rlj11</b> <b>(Jointly Administered Under</b> <b>Case No. 18-50214)</b>
<b>Debtor.</b>	§	
<hr/>	§	
<b>IN RE:</b>	§	
<b>REAGOR-DYKES AMARILLO, LP</b>	§	<b>Case No. 18-50216-rlj11</b> <b>(Jointly Administered Under</b> <b>Case No. 18-50214)</b>
<b>Debtor.</b>	§	
<hr/>	§	
<b>IN RE:</b>	§	
<b>REAGOR-DYKES AUTO COMPANY, LP</b>	§	<b>Case No. 18-50217-rlj11</b> <b>(Jointly Administered Under</b> <b>Case No. 18-50214)</b>
<b>Debtor.</b>	§	
<hr/>	§	

IN RE:	§	§	§	§
<b>REAGOR-DYKES PLAINVIEW, LP</b>	§	<b>Case No. 18-50218-rlj11</b>	<b>(Jointly Administered Under</b>	<b>Case No. 18-50214)</b>
Debtor.	§			
IN RE:	§	§	§	§
<b>REAGOR-DYKES FLOYDADA, LP</b>	§	<b>Case No. 18-50219-rlj11</b>	<b>(Jointly Administered Under</b>	<b>Case No. 18-50214)</b>
Debtor.	§			

**MANHEIM'S MOTION TO EXPEDITE HEARING ON**  
**MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Creditors Manheim Remarketing, Inc. and Online Vehicle Exchange, L.L.C. (collectively, “Manheim”) respectfully move this Court to expedite its hearing on its motion for relief from the automatic stay so that its motion can be heard concurrently with the motion for relief from the automatic stay filed by Ford Motor Credit Company LLC on August 16, 2018 at 10:00 a.m.. This motion is brought pursuant to Bankruptcy Rule 9006(c) and Local Bankruptcy Rule 9.003.1.

**BASIS FOR EXPEDITED HEARING**

Manheim filed its motion to lift the automatic stay seeking to have the stay lifted to allow it to foreclose its purchase money security interest in sixteen (16) vehicles that were purchased from it by Debtor. Ford Motor Credit Company LLC has filed a motion to lift stay to allow it to repossess and foreclose its interest in motor vehicles at Debtor’s automobile dealerships. It is assumed that the sixteen (16) vehicles upon which Manheim has a purchase money security interest are located at the same dealerships. Therefore, if the automatic stay is lifted for

Manheim at the same time as for Ford Motor Credit LLC, the parties will be able to sort out the lien priorities at that time.

WHEREFORE, Manheim requests that the Court enter an order expediting the hearing on its motion to lift the automatic stay to coincide with the hearing of Ford Motor Credit LLC's motion to lift stay which is August 16, 2018 at 10:00 a.m. and for such other and further relief as it may show itself entitled.

Respectfully submitted,

MCCLESKEY, HARRIGER, BRAZILL & GRAF, L.L.P.  
5010 University Ave FL 5  
Lubbock, Texas 79413-4422  
(806) 796-7300; (806) 796-7365 [fax]  
Tommy J. Swann, SBN 19552820  
tswann@mhbgb.com  
Michael S. Uryasz, SBN 24082440  
muryasz@mhbgb.com

By:/s/ Tommy J. Swann  
Tommy J. Swann

ATTORNEYS FOR MANHEIM

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Motion was served on the following parties via ECF and/or regular U.S. Mail on this 14th day of August, 2018:

1. Reagor Dykes Auto Group  
1215 Ave. J  
Lubbock, TX 79401
2. Keith Langley and Brandon K. Bains  
Langley LLP  
1301 Solana Blvd., Bldg. 1, Suite 1545  
Westlake, TX 76262  
Email: [klangley@l-llp.com](mailto:klangley@l-llp.com) and [bbains@l-llp.com](mailto:bbains@l-llp.com)  
*Attorneys for Ford Motor Credit*
3. Donald Cram and Duane M. Geck  
Severson & Werson  
One Embarcadero Center, Suite 2600  
San Francisco, CA 94111  
Email: [dmg@severson.com](mailto:dmg@severson.com) and [dhc@severson.com](mailto:dhc@severson.com)
4. U.S. Trustee's Office  
1100 Commerce St., Room 9C60  
Dallas, TX 75242
5. All parties receiving notice via ECF in this case.

/s/ Tommy J. Swann  
Tommy J. Swann